

EXHIBIT 4

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File Number: 0674061-00003

September 9, 2022

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BY EMAIL

Andrew Stephens
HACKER STEPHENS LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746

Dear Andrew:

Pursuant to the Court's August 25, 2022 Order, Defendant Planned Parenthood Federation of America, Inc. ("PPFA") is providing amended responses to Relator's First (No. 7) and Second (Nos. 2-3) Requests for Production, and supplementing its production in response to those requests with documents bearing Bates numbers PPFA00036309 through PPFA00349922. You will shortly receive a link and log-in information to a website that is hosting these documents. Under Paragraph 2(a) of the July 25, 2022 Protective Order, 9,133 documents are designated as containing "Confidential Information." 55,207 documents are designated "Confidential Attorney Eyes Only Information" under Paragraph 2(b) of the Protective Order.

After the Court's August 25, 2022 order on Relator's motion to compel, PPFA immediately began collecting documents for a supplemental production, with more than 275k custodial and non-custodial documents initially collected and processed. The 16 custodians from whom PPFA collected, processed, reviewed, and produced data are identified in Table 1 of Exhibit A. In collecting electronically stored information, PPFA used the search terms listed in Table 2 of Exhibit A. To meet the Court's September 9, 2022 production deadline, and as PPFA previously informed Plaintiffs, PPFA utilized a combination of individual-document review and a TAR/Continuous Active Learning review using Brainspace as the tool. Thousands of documents, across both diversity and stratified samples were used to train the model. PPFA assessed model stability using statistically drawn Control Set and Validation samples and established a cut-off score. All documents above the cut-off score and their respective families were screened for privilege and confidentiality before production.

PPFA will provide a privilege log as soon as practicable. Under Paragraph 6 of the Protective Order, the inadvertent failure to designate or withhold any information as confidential or privileged will not be deemed to waive the claim of confidentiality or privilege. Consistent with that, PPFA reserves the right to designate at a later date any confidential or privileged information inadvertently produced or inadvertently not appropriately designated as confidential. Due to the inclusion of two attorney custodians and the substantial volume of documents in this production, PPFA may supplement its production with documents currently withheld as privileged if they are downgraded during the logging process.

PPFA reserves all rights, privileges, and objections.

Very truly yours,



Leah Godesky

cc:

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Raymond Winter, et al.

OFFICE OF THE ATTORNEY GENERAL OF TEXAS

Raymond.Winter@oag.texas.gov

EXHIBIT A

Table 1

Custodian Name	Title
Vickie Barrow-Klein	Executive Vice President, Chief Operating Officer, and Chief Financial Officer
Meagan Cavanaugh	(Former) National Director, Affiliate Services
Kim Custer	Executive Vice President and Chief Federation Engagement & Impact Officer
Tamara Kramer	Director, Health Care Investment Program
Cecile Richards	(Former) President, CEO
Stephanie Shaw	(Former) Strategic Manager for Health Finance
Emily Stewart	(Former) Vice President of Public Policy
Teri Trivisonno	Vice President, Health Care Operations
Kelley Wall	National Director, Health Care Operations
Eric Ferrero	(Former) Vice President, Communications
Adrienne Verilli	Vice President, Communications & Culture
Emily Shifrin	National Director, Accreditation
Gillian Dean	(Former) Chief Medical Officer
Krishna Upadhya	Vice President, Quality Care and Health Equity
Carrie Flaxman	Senior Director, Public Policy Litigation & Law
Jennifer Sandman	Senior Director, Public Policy Litigation & Law

Table 2

Medicaid and (LA or TX or Louisiana or Texas)
“@ppgulfcoast.org” or “@ppgt.org” or “@ppsouthtexas.org”
“Gulf Coast” or gulf /2 coast
“Greater Texas” or greater /2 Texas
“South Texas” or south /2 Texas
“Cameron County” or Cameron /2 County
“San Antonio” or San /2 Antonio
Ken or Kenneth or (Ken! /2 Lambrecht)
Jeff or Jeffrey or (Jeff! /2 Hons)
Melaney or (Melaney /2 Linton)
Lambrecht
Hons
Linton
PPGT
PPGC
PPST
PPCC
PPSA